

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

WOOD GROUP POWER, INC.)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:11-CV-01046
)	
PROENERGY SERVICES, LLC)	District Judge Vanessa D. Gilmore
)	
Defendants.)	

JOINT MOTION FOR PROTECTIVE ORDER

COMES NOW Plaintiff, Wood Group Power, Inc., and Defendant, ProEnergy Services, LLC, (collectively “the Parties”), by and through their respective counsel, and jointly request this Court to approve and enter the Agreed Protective Order signed by the Parties.

1.

In conducting discovery in this matter, the Parties have requested, and/or it is anticipated that such requests will be made for, information that constitutes intellectual property, trade secrets and/or confidential/proprietary information of the Parties or that implicates personal privacy concerns of the Parties.

2.

In order to balance the need for discovery of relevant information against potential confidentiality and privacy concerns, the Parties have entered into an Agreed Protective Order that provides, among other things, requirements for the protection, production, use, and disclosure of information deemed Confidential or Highly Confidential by one or both of the Parties. The Agreed Protective Order does not attempt to modify any of the Court’s Local Rules or Procedures nor does it attempt to alter the requirements and deadlines set by the Court. A

copy of the Agreed Protective Order signed by the respective parties is attached hereto as Exhibit 1.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court approve and enter the Agreed Protective Order.

Jointly submitted by the Parties this the 25th day of August, 2011.

/s/ *Martin J. Regimbal*

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CERTIFICATE OF SERVICE

I, Martin J. Regimbal, do hereby certify that I have this day electronically filed the foregoing Joint Motion for Protective Order with the Clerk of the Court using the ECF system which sent notification of such filing to the following::

THIS, the 25th day of August, 2011.

/s/ Martin J. Regimbal
MARTIN J. REGIMBAL